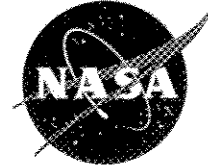


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



January 5, 2010

Reply to Attn of General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Universities
Space Research Association (USRA) Reception on January 14, 2010

On January 14, 2010, Universities Space Research Association (USRA), a 501(c)(3) organization under the Internal Revenue Code, will host a symposium from 1:00 p.m.-5:00 p.m., and a reception at 5:30p.m., at the Madison Hotel, in Washington, D. C. The symposium will address the role of the research university in civil, commercial, national security, and international space.

Approximately 200 individuals have been invited. Attendees will include NASA personnel, officials from other federal agencies, members of Congress and their staffers and representatives of academia, and industry and other aerospace associations. The estimated cost of the event, which includes all food and beverages is \$90.00 per person.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event because they will have the opportunity to share views on the civil space program with their counterparts in civil, commercial, national security and international space. Moreover, NASA employees whose duties do not substantially affect the event sponsor, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event for themselves and their invited guests.

However, NASA employees whose duties may substantially affect USRA, or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 CFR § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone", written in a cursive style.

Adam F. Greenstone